

MULLIN HOARD & BROWN, L.L.P.

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Motors, LP; Reagor-Dykes Imports, LP;

Reagor-Dykes Amarillo, LP; Reagor-Dykes

Auto Company, LP; Reagor-Dykes

Plainview, LP; Reagor-Dykes Floydada, LP

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
LUBBOCK DIVISION**

IN RE:	§	
	§	
REAGOR-DYKES MOTORS, LP	§	Case No. 18-50214-rlj11
	§	
Debtor.	§	
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IN RE:	§	
	§	
REAGOR-DYKES IMPORTS, LP	§	Case No. 18-50215-rlj11
	§	(Jointly Administered Under
Debtor.	§	Case No. 18-50214)
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IN RE:	§	
	§	
REAGOR-DYKES AMARILLO, LP	§	Case No. 18-50216-rlj11
	§	(Jointly Administered Under
Debtor.	§	Case No. 18-50214)
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IN RE:	§	
	§	
REAGOR-DYKES AUTO COMPANY, LP	§	Case No. 18-50217-rlj11
	§	(Jointly Administered Under
Debtor.	§	Case No. 18-50214)
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IN RE:	§	
	§	
REAGOR-DYKES PLAINVIEW, LP	§	Case No. 18-50218-rjl11
	§	

Debtor.	§	(Jointly Administered Under Case No. 18-50214)
IN RE:	§	
REAGOR-DYKES FLOYDADA, LP	§	
Debtor.	§	Case No. 18-50219-rlj11
	§	(Jointly Administered Under
	§	Case No. 18-50214)

**DEBTORS' MOTION FOR ORDER EXTENDING DEADLINE
TO FILE SCHEDULES AND STATEMENT OF FINANCIAL AFFAIRS**

TO THE HONORABLE ROBERT L. JONES, U.S. Bankruptcy Judge:

NOW COME, Reagor-Dykes Motors, LP, Reagor-Dykes Imports, LP, Reagor-Dykes Amarillo, LP, Reagor-Dykes Auto Company, LP, Reagor-Dykes Plainview, LP, and Reagor-Dykes Floydada, LP (each a "Debtor," and collectively, the "Debtors"), the Debtors in the above-referenced bankruptcy proceedings, and file this their Motion for Order Extending Deadline to File Schedules and Statement of Financial Affairs ("Motion"), and, pursuant to Rule 1007(c) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), seek entry of an order extending the time within which the Debtors must file its schedules of assets and liabilities, lists, and statement of financial affairs for a total of thirty days (30) additional days from the time period required under the Bankruptcy Rules. In support, the Debtors would respectfully show the Court as follows:

**I.
BACKGROUND**

1. On August 1, 2018 (the "Petition Date"), the Debtors filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). Pursuant to §§ 1107(a) and 1108 of the Bankruptcy Code, the Debtors continue to operate their businesses and manage their properties, affairs, and assets as debtors-in-possession.

2. This is a core proceeding, and this Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 1334 and 157. The basis for the relief requested herein is Bankruptcy Rule 1007(c) and Local Rule 1007-1(b).

II.

RELIEF REQUESTED

3. By this Motion, Debtors seek entry of an order pursuant to Bankruptcy Rule 1007(c) extending the time within which it must file its schedules of assets and liabilities, lists, and statement of financial affairs (the “Schedules”), as required by § 521 of title 11 of the United States Code (the “Bankruptcy Code”), for an additional thirty (30) days after the time period set forth in Bankruptcy Rule 1007(c).

III.

ARGUMENTS AND AUTHORITIES

4. Bankruptcy Rule 1007(b)(1) provides that a “debtor, unless the court orders otherwise, shall file the following schedules, statements, and other documents....” Fed. R. Bankr. P. 1007(b)(1). Bankruptcy Rule 1007(c) provides that the schedules, statements, and other documents shall be filed with the petition or within 14 days thereafter. Fed. R. Bankr. P. 1007(c).

5. Bankruptcy Rule 1007(c) further authorizes the Court to extend a debtors’ time to file the Schedules on a motion for cause shown. Debtors submit that “cause” exists sufficient to extend their time to file the Schedules in view of the facts and circumstances of this case. Counsel for Debtors would show that due to the complicated nature of these cases and the volume of information to be gathered, additional time is warranted for filing of the Debtors’ Schedules. The information needed for filing each set of Schedules for the Debtors is voluminous, and although Debtors are working to gather the necessary information, demands

from the major secured creditor for records and information at the same time is stretching the resources of the Debtors who are able to assist in gathering the appropriate information necessary to prepare all of the Schedules required by the Bankruptcy Code and Rules. Therefore, the Debtors are making this request for an extension of time to prepare and file such Schedules and Statement of Financial Affairs.

6. Debtors have begun and will continue to work diligently to compile the information necessary to complete the Schedules. Debtors believes that adding an additional thirty (30) days to the time period set forth in Bankruptcy Rule 1007(c) will provide sufficient time for Debtors to prepare and file their Schedules.

7. Additionally, Debtors' counsel spoke with the U.S. Trustee's Office, and the U.S. Trustee's Office rescheduled the Debtors' 341 Creditors Meeting from September 6, 2018 to September 27, 2018. The U.S. Trustee has also agreed to the requested extension of thirty (30) days.

8. Therefore, Counsel for Debtors is requesting an additional thirty (30) days to allow the Debtors time to gather all of the appropriate information to get the schedules filed correctly, making the Schedules due on or before September 14, 2018.

9. No previous request for the relief sought herein has been made to this Court or any other court. This Motion is sought in good faith and not for the purpose of delay.

PRAYER

WHEREFORE, the Debtors respectfully request entry of an order extending the time to file schedules and statements for an additional thirty (30) days to the time period prescribed in the Bankruptcy Rules. Further, the Debtors pray for such other and further relief, at law or in equity, to which the Debtors may show themselves justly entitled.

Respectfully Submitted,

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/s/ Brad W. Odell

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Plainview, LP; Reagor-Dykes Floydada, LP

CERTIFICATE OF CONFERENCE

Counsel for the Debtors conferred with Stephen McKitt of the U.S. Trustee's Office regarding the relief requested herein on August 9th, 2018. Mr. McKitt informed Debtors' Counsel that the U.S. Trustee's Office does not oppose the relief requested by this Motion.

/s/ Brad W. Odell

Brad W. Odell

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Motion was served on the following parties in interest, via U.S. First Class mail, on this 11th day of August, 2018:

1. Reagor Dykes Auto Group
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2. Keith Langley and Brandon K. Bains
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Attorneys for Ford Motor Credit
4. U.S. Trustee's Office
1100 Commerce St., Room 9C60
Dallas, Texas 75242
5. All parties receiving notice via ECF in this case.

/s/ Brad W. Odell _____

Brad W. Odell